

Anti-bribery and Corruption Policy



We are committed to conducting business and activities with integrity. We do what is right, act with honesty and transparency and don't make or receive improper payments, benefits or gains or participate in corruption

The policy prohibits the DRA Group, its directors, employees, business partners and any other person or organisation acting for or on the DRA Group's behalf from engaging in activity that constitutes bribery and corruption, including fraud, facilitation payments or other improper payments, extortion, money laundering or other related improper conduct.

Facilitation payments are payments made to facilitate or expedite the performance by government officials or employees of non-discretionary and routine government actions. Improper payments can include kickbacks, bribes, secret commissions or pay-offs made in order to influence favourably any decision which affects our business or gives rise to personal gain.

We have a zero-tolerance approach to bribery and corruption across all areas and levels of the business. We expect that third parties acting on our behalf do the same.

Our reputation is built on our values as a company, the professionalism of our people and our collective commitment to acting with integrity, accountability and transparency, at all times.

Bribery and corruption can undermine legitimate business activities, distort competition and expose the DRA Group and its people to significant risks, including reputational risks. We are committed to doing business with integrity, which includes always complying with bribery and corruption laws in the countries in which we operate and supporting the UN Global Compact Initiative to eliminate bribery and corruption in all forms.

Our anti-bribery and corruption principles:

- / We always act in the best interest of the DRA Group.
- / We strictly prohibit any offer, of or acceptance of or request for, facilitation payments or improper payments or any engagement in money laundering, either directly or indirectly.
- / We never give or receive gifts, entertainment, travel, or hospitality that are excessive, inappropriate, or have the potential to improperly influence, or be perceived to improperly influence, a decision or outcome.

- / We never engage in any form of corrupt business practices or fraudulent behaviour, whether for the benefit of the DRA Group, its directors, employees, business partners or another person.
- / We never offer or promise donations to a charity, community cause or political party with the intention to inappropriately influence anyone, including a government official or employee.
- / We always comply with the requirements of sanctions regimes applied by the jurisdictions in which we operate.

Each one of us and our business partners have a responsibility and are empowered to prevent and help detect bribery and corruption. You must, promptly and without delay, report potential or suspected issues of bribery and corruption or other related concerns to our legal team or through our Speak Up service.

If you are unsure of what may potentially be bribery, corruption or a facilitation payment or if you are uncertain whether it is appropriate to give or receive gifts or hospitality in any particular circumstance, you should speak with your manager or a member of the legal team.

This is a policy of DRA Global Limited and its controlled entities (collectively, "DRA Group"). It applies to all directors, employees and business partners of each member of the DRA Group and to any consultants, contractors and other third-parties notified of its application to them.

More information on the definition of bribery and corruption is available from your manager or in the DRA Group's **Anti-Bribery and Corruption – Group Standard**, which is available on the DRA Global Limited website.

Approved by the DRA Global Limited Board of Directors on 8 June 2020